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U.S. Department of Justice

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July 25, 2024

**Via Hand Delivery – Not to Be Filed**

Kate M. Fogarty  
Clerk of Court, United States District Court – District of Minnesota  
300 South Fourth Street – Suite 202  
Minneapolis, MN 55415

Re: *United States v. Evergreen Recovery Inc. et al.*, Case No. \_\_\_\_\_

Dear Ms. Fogarty:

I write on behalf of the United States regarding a filing we are making with the Court concurrently with this letter. We respectfully request that the United States be permitted to make the entire filing under seal.

The United States is filing a request for an *ex parte* Temporary Restraining Order pursuant to 18 U.S.C. § 1345 that, if granted, will have the effect of freezing Defendants' assets. As laid out in the Complaint and the accompanying Motion to Seal, the United States has reason to believe Defendants are engaged in a healthcare fraud scheme that has resulted in at least \$28 million in losses to Medicaid. Having this case placed under seal until service of process is perfected is necessary because of the nature of the relief requested. If Defendants are alerted to this action before they receive service of process of a TRO they may have an opportunity dissipate or hide the very assets the TRO seeks to preserve.

Thank you for your attention to this matter.

Sincerely,

ANDREW M. LUGER  
United States Attorney

*s/ Emily M. Peterson*

By: Emily M. Peterson  
Assistant United States Attorney

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JUL 25 2024  
CLERK  
U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

